

1 JORDAN P. SCHNITZER, ESQ.
2 Nevada Bar No. 10744
3 THE SCHNITZER LAW FIRM
4 9205 W. Russell Road, Suite 240
5 Las Vegas, Nevada 89148
6 Telephone: 702.960.4050
Facsimile: 702.960.4092
Jordan@TheSchnitzerLawFirm.com
*Attorney for Plaintiffs, James Song and
Adrienne Song*

7 **UNITED STATES DISTRICT COURT**
8
FOR THE DISTRICT OF NEVADA

9 JAMES SONG, an individual; ADRIENNE
10 SONG, an individual,
Plaintiffs,

Case No.: 2:18-cv-00757-JCM-PAL

11 vs.

12 MTC FINANCIAL INC. DBA TRUSTEE
13 CORPS; WELLS FARGO BANK, N.A.
successor by merger to WELLS FARGO BANK
14 MINNESOTA, N.A. AS TRUSTEE FOR
MERRILL LYNCH MORTGAGE INVESTORS
15 TRUST, SERIES MLCC 2003-A; MLCC 2003-
A; BANK OF AMERICA, N.A.; PHH
16 MORTGAGE CORPORATION; MICHAEL
DANLAG, an individual; DOES 1-10 inclusive;
17 and ROE COMPANIES 1-10, inclusive,

Defendants.

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY IN
SUPPORT OF PLAINTIFFS'
COUNTERMOTION TO AMEND
COMPLAINT [ECF NO. 68]**

(First Request)

22 Plaintiffs James Song and Adrienne Song (together, "Plaintiffs") and Defendants PHH
23 Mortgage Corporation ("PHH"), Wells Fargo Bank Minnesota, N.A. as Trustee for Merrill Lynch
24 Mortgage Investors Trust, Series MLCC 2003-A, ("Wells Fargo"), Merrill Lynch Mortgage
25 Investors Trust, Series MLCC 2003-A (the "Trust"), and Michael Danlag (together,
26 "Defendants"), stipulate and agree that Plaintiffs have up to and including October 14, 2020 to file
a Reply in support their Countermotion to Amend Complaint [ECF No. 68].

27 This is the first request for an extension, and it is made in good faith and not for purposes
28

1 of delay. Counsel requests the extension due their schedule.
2

3 DATED this 7th day of October 2020.

4 THE SCHNITZER LAW FIRM

5 BY: /s/ Jordan P. Schnitzer, Esq.

6 Jordan P. Schnitzer, Esq.
7 Nevada Bar No. 10744
8 9205 W. Russell Road, Suite 240
9 Las Vegas, Nevada 89148
10 Attorney for Plaintiffs

DATED this 7th day of October 2020.

BALLARD SPAHR LLP

BY: /s/ Holly Ann Priest, Esq.

Abra E. Vigil, Esq.
Nevada Bar No. 7548
Holly Ann Priest, Esq.
Nevada Bar No. 13226
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
Attorneys for Defendants

11 **ORDER**

12 IT IS SO ORDERED:

13 DATED: October 7, 2020

14 
15 UNITED STATES DISTRICT JUDGE

